FILED
BRYAN MUNICIPAL COURT
Dec 5, 2025 - 01:23:43 PM

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO : CASE NO. CRB2400102
:
v. : JUDGE KENT L. NORTH
:
JEREMY LEE SHEPHERD :

[PROPOSED] JUDGMENT ENTRY GRANTING
EMERGENCY MOTION TO STAY

The Court has reviewed Defendant's Emergency Motion to Stay December 9, 2025 hearing and finds good cause exists to grant the motion.

IT IS HEREBY ORDERED that:

1. The December 9, 2025 hearing is STAYED;

2. All enforcement actions are STAYED pending ruling on Motion to Vacate;

3. The Court shall rule on Defendant's Motion to Vacate Judgment (filed November 19, 2025) within 14 days;

4. The probation violation report shall be unsealed and provided to Defendant.

_____
Kent L. North, Judge

Date: _____

FILED
BRYAN MUNICIPAL COURT
Dec 5, 2025 - 01:24:33 PM

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO : CASE NO. CRB2400102
:
v. : JUDGE KENT L. NORTH
:
JEREMY LEE SHEPHERD :

[PROPOSED] JUDGMENT ENTRY
GRANTING MOTION TO COMPEL DISCOVERY

The Court has reviewed Defendant's Motion to Compel Production of Records and Discovery.

The Court finds that Defendant is entitled to the requested discovery under Ohio Crim.R. 16, Brady v. Maryland, and due process.

IT IS HEREBY ORDERED that:

1. The State shall produce all materials requested in Defendant's Motion to Compel within 14 days of this order;

2. All proceedings in this case are STAYED pending production of discovery and Defendant's reasonable time to review (minimum 30 days after production);

3. If any requested materials are claimed to be privileged, they shall be submitted to the Court for in camera review within 7 days;

4. The Clerk shall produce complete audit logs for this case showing all docket entries, modifications, and deletions with timestamps and user IDs within 7 days;

5. Failure to produce requested materials may result in sanctions including dismissal of charges with prejudice;

6. All electronic records and communications related to this case shall be preserved pending final resolution.

_____
Kent L. North, Judge

Date: _____

FILED
BRYAN MUNICIPAL COURT
Dec 5, 2025 - 01:27:54 PM

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO : CASE NO. CRB2400102
:
v. : JUDGE KENT L. NORTH
:
JEREMY LEE SHEPHERD :

MOTION TO COMPEL PRODUCTION OF RECORDS AND DISCOVERY

Defendant moves this Court to compel production of records and discovery pursuant to Ohio Crim.R. 16, Brady v. Maryland, 373 U.S. 83 (1963), and basic due process.

These records are essential to Defendant's pending Motion to Vacate Judgment and defense of his constitutional rights.

I. 911 DISPATCH RECORDS - JANUARY 31, 2024

REQUEST:
- Complete audio recording of 911 call placed by Defendant
- Computer-aided dispatch (CAD) logs showing:
  - Time of call
  - Content of call
  - Information provided to Deputy Maynard
  - Deputy Maynard's location when dispatched
  - Timeline of deputy's arrival
  - Any notations about dog at residence

RELEVANCE:
Deputy Maynard's written statement claims he "entered the home" and went upstairs to contact the alleged victim. The 911 call and dispatch records will prove this statement is false. Defendant called 911 while alleged victim was already outside. Deputy never entered home.

This is Brady material - it directly contradicts the officer's sworn statement and proves the criminal complaint was based on false information.

II. LAW ENFORCEMENT RECORDINGS

REQUEST:
- Deputy Tyler Maynard body camera footage from January 31, 2024
- Dash camera footage from Deputy Maynard's vehicle
- Any audio recordings from the incident
- Mobile data terminal (MDT) records from Deputy's vehicle

RELEVANCE:
These recordings will prove Deputy Maynard never entered the home, contradicting his false statement. They will also document the actual interaction, including Defendant's criticism of the deputy's firearm handling (which motivated the retaliatory false complaint).

This is Brady material proving the complaint was based on fabricated information.

III. LISA NYE EMPLOYMENT AND AUTHORITY RECORDS

REQUEST:
- Complete employment records for Lisa L. Nye from Williams County Sheriff's Office (2013-present)
- All oaths of office taken by Lisa Nye
- All criminal complaints signed by Lisa Nye from 2013-present
- Any authorizations, directives, or policies allowing Sheriff's Office employees to sign criminal complaints as court officials
- Communications between Sheriff's Office, County administration, and Bryan Municipal Court regarding this practice
- Documentation of county legal counsel's approval of this arrangement (referenced in Ms. Nye's email)

RELEVANCE:
New evidence (Exhibit A - Lisa Nye email) proves Ms. Nye was continuously employed by Sheriff's Office while signing criminal complaints as "Deputy Clerk." Her 2013 oath (Exhibit D) was signed by Judge Kent L. North. These records will show the scope and duration of this conflicted practice and county officials' knowledge and approval of it.

This is essential to proving the complaint is void and establishing municipal liability.

IV. KYLEE TOWNE CONFLICT OF INTEREST RECORDS

REQUEST:
- Records of Kylee Towne's appointment as Director of Williams County Job and Family Services (October 2024)
- Records of her representation on the juvenile dependency docket
- Any conflict screening or waiver related to her representation of Defendant while serving in these roles
- Communications between Kylee Towne and JFS regarding Defendant's case
- Records of JFS involvement in removal of children from Defendant's home

RELEVANCE:
Defendant's court-appointed attorney became Director of the agency (JFS) that removed children from his home and has systemic interest adverse to him. She represented clients on

dependency docket while serving as his criminal defense attorney. These records will prove ineffective assistance of counsel due to conflict of interest.

V. COURT DOCKET METADATA AND AUDIT LOGS

REQUEST:
- Complete audit logs for Case No. CRB2400102 showing:
  - All docket entries with creation timestamps
  - All modifications to docket entries with timestamps
  - All deletions from docket with timestamps
  - User IDs of persons making entries/modifications
  - IP addresses or computer IDs used to access case
- System metadata for all entries dated November 26, 2025

RELEVANCE:
Screenshots with phone metadata (Exhibits B-1 and B-2) prove court entries were created on December 1, 2025 and backdated to November 26, 2025. Court audit logs will confirm this falsification of the official court record.

This is essential to proving consciousness of guilt and bad faith by the Court.

VI. COMMUNICATIONS AND COORDINATION

REQUEST:
- All communications between Deputy Tyler Maynard, Lisa Nye, Prosecutor James Duranczyk, and court officials regarding this case (January 31, 2024 - March 4, 2024)
- Communications regarding issuance of Temporary Protection Order before arraignment
- Communications regarding rescheduling of arraignment from March 21 to March 13, 2024
- Communications regarding the December 9, 2025 combined hearing
- Communications regarding backdating of November 26 entries

RELEVANCE:
These communications will show coordination among officials and demonstrate whether the procedural irregularities were intentional or negligent.

VII. ARRAIGNMENT RECORDING AND RIGHTS ADVISEMENT

REQUEST:
- Complete audio/video recording of March 13, 2024 arraignment
- Recording played to Defendant advising of rights
- Any written materials provided to Defendant
- Court reporter's notes or transcript if available

RELEVANCE:

Defendant was advised of rights via a recording rather than by the judge personally. Recording likely misstated the right to jury trial (led Defendant to believe bench trial was default). This is essential to proving plea was not knowing and voluntary.

VIII. EXCULPATORY EVIDENCE

REQUEST:
- All statements made by the juvenile accuser regarding the allegations
- All statements made by the juvenile accuser's mother
- Video recording referenced in discovery showing mother admits allegation was fabricated based on TV show
- Background and credibility information regarding juvenile accuser, including:
  - History of dishonesty
  - Current detention status (serving 3-month sentence)
  - Reasons for detention
- All records regarding foster placement of children removed from home
- All communications with foster family
- Mail return receipt showing Temporary Protection Order sent to alleged victim was returned as "undeliverable"

RELEVANCE:
This is classic Brady material. The accuser's mother admitted on video the allegation was fabricated after watching a South Park episode. Accuser has documented history of dishonesty and is currently detained. TPO could not be served on alleged victim. All of this is exculpatory and should have been disclosed before plea.

IX. ADA COMPLIANCE AND ACCOMMODATION RECORDS

REQUEST:
- All ADA policies and procedures for Bryan Municipal Court
- Training records for court staff on ADA compliance
- All documents related to Defendant's ADA accommodation requests
- Communications regarding Defendant's requests
- Any ADA coordinator designations or contacts

RELEVANCE:
Defendant filed detailed ADA accommodation request which Court ignored, then ordered opposite of requested accommodation. These records will show whether Court has any ADA compliance procedures and whether they were followed.

X. PROBATION RECORDS

REQUEST:
- Sealed probation violation report filed November 25, 2025

- All communications between Probation Officer Kelly Tietje and Defendant
- Report of stalking/harassment incident in courthouse parking lot (referenced in Defendant's communications with probation)
- All communications regarding filing of probation violation
- Probation department policies on accommodating disabled probationers

RELEVANCE:
Violation report is sealed, violating due process. Defendant reported harassment in parking lot; probation took no protective action then filed violation when Defendant asserted ADA rights. This proves retaliation.

XI. DEPUTY MAYNARD RECORDS

REQUEST:
- Complete personnel file for Deputy Tyler Maynard
- Date of birth and/or hire date
- Training records, especially firearms training
- Field training evaluations
- Any disciplinary records
- Any complaints against Deputy Maynard
- Supervisory review policies for criminal complaints
- Documentation of any supervisory review before this complaint was filed

RELEVANCE:
Deputy Maynard was approximately 21 years old at time of incident. His age and experience level are relevant to assessing his credibility, judgment, and training. Records will show whether Sheriff's Office has adequate supervision procedures and whether they were followed.

XII. TEMPORARY PROTECTION ORDER RECORDS

REQUEST:
- Complete file for Temporary Protection Order issued in this case
- Documentation of service or attempted service
- Copy of TPO faxed to Edon Police Department on March 6, 2024 (week before arraignment)
- Return receipt or proof of mailing showing TPO sent to alleged victim was returned as undeliverable
- Communications regarding issuance of TPO before arraignment

RELEVANCE:
TPO was issued and sent to police before Defendant was arraigned or advised of charges. TPO could not be served on alleged victim (returned undeliverable), yet court proceeded as if victim was accessible. This shows procedural irregularities and lack of actual victim involvement.

LEGAL AUTHORITY

Under Ohio Crim.R. 16, Defendant is entitled to discovery of material within possession or control of the State.

Under Brady v. Maryland and its progeny, the State must disclose evidence favorable to the accused, whether requested or not. Suppression of such evidence violates due process where the evidence is material to guilt or punishment.

Here, the requested materials include:
- Evidence proving the criminal complaint was based on false statements (dispatch records, body cam)
- Evidence proving the complaint is void (Lisa Nye records)
- Evidence proving ineffective assistance of counsel (Kylee Towne records)
- Evidence of exculpatory information withheld from defense (victim's mother's admission, accuser's credibility issues)
- Evidence of court misconduct (docket audit logs)
- Evidence of retaliation (communications, timing)

All of this is material to Defendant's Motion to Vacate and his constitutional rights.

GOOD CAUSE

Good cause exists for this discovery because:

1. These materials are in possession or control of State actors (Sheriff, Court, Prosecutor, JFS)

2. Defendant cannot obtain these materials through other means

3. The materials are directly relevant to pending Motion to Vacate and constitutional claims

4. Some materials are Brady material that should have been disclosed before plea

5. Some materials prove the conviction is void and must be vacated

6. Defendant has demonstrated specific need for each category of materials

RELIEF REQUESTED

1. ORDER all requested materials produced within 14 days;

2. STAY all proceedings until discovery is produced and Defendant has reasonable time to review;

3. COMPEL production of any materials claimed to be privileged with in camera review by the Court;

4. SANCTION the State for Brady violations by:
- Dismissing charges with prejudice, OR
- Vacating conviction and prohibiting retrial, OR
- Imposing other appropriate sanctions

5. REFER Brady violations to appropriate disciplinary authorities;

6. ORDER preservation of all electronic records and communications pending resolution of this case.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com
Date: December 5, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via email upon:

James F. Duranczyk, City Prosecutor
c/o pnickolite@cityofbryan.com

Date: December 5, 2025

/s/ Jeremy Lee Shepherd

FILED
BRYAN MUNICIPAL COURT
Dec 5, 2025 - 01:28:40 PM

December 5, 2025

Bryan Municipal Court
Case No. CRB2400102
State of Ohio v. Jeremy Lee Shepherd

COVER LETTER

The following documents are being filed today in the above case:

1. Emergency Motion to Stay December 9, 2025 Hearing
2. Supplemental Evidence in Support of Motion to Vacate
3. Motion to Compel Production of Records
4. Supplement to Motion to Vacate (Public Posting)

Exhibits attached:
- Exhibit A: Email correspondence with Lisa Nye
- Exhibit B-1: Screenshot December 1, 2025 at 1:12 AM
- Exhibit B-2: Screenshot December 1, 2025 at 4:58 PM
- Exhibit C: Notice of Assignment dated December 1, 2025
- Exhibit D: Lisa Nye Oath signed by Judge Kent L. North

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com

FILED
BRYAN MUNICIPAL COURT
Dec 5, 2025 - 01:29:23 PM

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO : CASE NO. CRB2400102
:
v. : JUDGE KENT L. NORTH
:
JEREMY LEE SHEPHERD :

SUPPLEMENT TO MOTION TO VACATE:
REQUEST TO SEAL CASE FILE AND REMOVE PUBLIC POSTING

Defendant supplements his Motion to Vacate Judgment (filed November 21, 2025) with this request regarding the public posting of the criminal complaint.

I. THE COMPLAINT REMAINS PUBLICLY ACCESSIBLE

Despite containing graphic allegations of sexual conduct with a minor, the criminal complaint in this case remains:
- Publicly posted on the Bryan Municipal Court website
- Searchable by Defendant's name
- Viewable by anyone with internet access
- Unredacted and unsealed

Standard practice for courts is to seal or redact cases involving:
- Allegations of sexual conduct
- Juvenile victims or alleged victims
- Unproven charges that could destroy a person's reputation

This case involves all three factors, yet the Court has taken no steps to protect either the alleged juvenile victim or the accused.

II. COMMUNITY HARM CAUSED BY PUBLIC POSTING

As a direct result of the public posting of these false allegations, Defendant has suffered:

A. HARASSMENT AND THREATS

Defendant has experienced severe harassment from community members in Williams County who:
- Viewed the graphic criminal complaint posted publicly on court website
- Received or saw fake letters circulating in the community falsely claiming Defendant was guilty and had a warrant
- Heard about the allegations through word-of-mouth in the small rural community

B. BEING LABELED

Despite never being convicted of any sexual offense, Defendant has been:
- Labeled a "child molester" in public
- Referred to by derogatory terms like "chomo"
- Subjected to social ostracism
- Unable to interact normally in the community
- Targeted by vigilante community members

C. ECONOMIC HARM

The public posting has caused:
- Loss of employment opportunities (employers Google his name and see allegations)
- Loss of gig economy work (Door Dash denied access based on pending charge)
- Inability to secure housing (landlords see allegations online)
- Forced sale of home to avoid foreclosure (no longer afford payments due to loss of job)

D. FORCED TO FLEE

The combination of public posting and resulting harassment forced Defendant to flee Williams County and ultimately Ohio entirely. He cannot return to the community where he lived for over 10 years.

III. FAKE LETTERS AMPLIFIED THE HARM

The public posting was amplified by fake letters that circulated throughout Edon, Ohio falsely claiming Defendant is guilty and had a warrant due to missing a court date" These letters do not appear to be official court documents but were made to look official.

The circulation of these fabricated letters, combined with the publicly accessible complaint, created a situation where Defendant was presumed guilty throughout the small community despite:
- Never being convicted
- The allegations being fabricated (as admitted by accuser's mother)
- The complaint being procedurally void
- No trial or evidentiary hearing ever occurring

IV. SELECTIVE SEALING DEMONSTRATES ARBITRARY TREATMENT

The Court has engaged in selective sealing that protects the Court's interests while exposing Defendant's reputation:

SEALED: Probation violation report (prevents Defendant from defending himself)

PUBLIC: Criminal complaint with graphic false allegations (destroys Defendant's reputation)

This arbitrary treatment suggests discriminatory intent or at minimum demonstrates inconsistent application of sealing procedures.

V. ONGOING IRREPARABLE HARM

Even if this Court eventually vacates the conviction (as it must), the harm from the public posting is permanent without sealing:

A. INTERNET SEARCHES

Google searches of "Jeremy Lee Shepherd" return the Bryan Municipal Court website showing the graphic allegations. This will follow Defendant forever unless the case is sealed and removed from public access.

B. BACKGROUND CHECKS

Any background check will show the criminal case, even if ultimately dismissed. The graphic nature of the allegations means:
- Future employers will see it
- Future landlords will see it
- Anyone who Googles his name will see it

C. COMMUNITY STIGMA

Defendant can never return to Williams County. The stigma cannot be erased. Community members will always remember the allegations, true or not.

D. FAMILY RELATIONSHIPS

The loss of the family home has damaged Defendant's relationship with his father that has cancer and biological son and made it impossible to maintain any parental role.

VI. COURT'S DUTY TO SEAL

Courts routinely seal cases involving:
- Juveniles (to protect their identity)
- Sexual allegations (due to their stigmatizing nature)
- Unproven charges (to protect the accused's reputation pending trial)

This case involves all three categories. The Court's failure to seal this case is a departure from standard practice that has caused catastrophic harm to Defendant.

Ohio law recognizes that certain information should be protected from public disclosure. R.C. 2151.358 addresses confidentiality in juvenile cases. Ohio courts have inherent authority to seal cases to protect privacy interests and prevent irreparable harm.

Here, the Court should have sealed this case:
- Upon filing (allegations involve juvenile and sexual conduct)
- Upon discovery of fabricated allegations (no legitimate public interest in false accusations)
- Upon pending Motion to Vacate (charges being challenged as void)

VII. COMPARISON TO OTHER JURISDICTIONS

Other courts in Ohio and nationwide routinely seal cases of this nature. Bryan Municipal Court's failure to do so is an outlier that suggests either:
- Deliberate intent to harm Defendant's reputation, OR
- Gross negligence in following standard procedures

Either way, the harm is severe and continuing.

VIII. REQUEST FOR SEALING IS INDEPENDENT OF MOTION TO VACATE

Even if the Court were to deny the Motion to Vacate (though it must grant it), the Court should still seal this case because:
- Allegations involve juvenile
- Allegations are of sexual nature
- Public posting causes irreparable harm
- Sealing protects both alleged victim and accused
- No legitimate public interest in publicizing unproven allegations

IX. RELIEF REQUESTED

Defendant respectfully requests this Court:

1. SEAL the entire case file in Case No. CRB2400102 immediately;

2. REMOVE the complaint and all case documents from public access on the court website;

3. REDACT Defendant's name from all publicly searchable court records;

4. ORDER that no information from this case be released to the public without court order;

5. Upon granting the Motion to Vacate Judgment (as the Court must), immediately EXPUNGE the record pursuant to R.C. 2953.52;

6. ORDER destruction of all copies of the complaint and related documents;

7. ISSUE order clarifying that Defendant was never convicted of any sexual offense and that the allegations were false;

8. INVESTIGATE the source of the fake letters circulated in the community and take appropriate action.

The public posting of false, graphic allegations of sexual conduct with a minor has destroyed Defendant's life. Only immediate sealing and eventual expungement can begin to remedy the harm.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com
Date: December 5, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via email upon:

James F. Duranczyk, City Prosecutor
c/o pnickolite@cityofbryan.com

Date: December 5, 2025

/s/ Jeremy Lee Shepherd

FILED
BRYAN MUNICIPAL COURT
Dec 5, 2025 - 01:30:33 PM

\IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO : CASE NO. CRB2400102
:
v. : JUDGE KENT L. NORTH
:
JEREMY LEE SHEPHERD :

SUPPLEMENTAL EVIDENCE IN SUPPORT OF MOTION TO VACATE JUDGMENT

Defendant submits additional evidence in support of his Motion to Vacate Judgment filed November 19, 2025.

I. NEW EVIDENCE OBTAINED

Since filing the Motion to Vacate, Defendant obtained email correspondence with Lisa L. Nye regarding her authority to sign the criminal complaint in this case.

Key emails Exhibit A.

II. KEY ADMISSIONS IN THE EMAIL

The email correspondence contains the following critical admissions from Lisa L. Nye:

1. EMAIL SIGNATURE BLOCK:

Every email from Ms. Nye bears the following signature:

"Lisa Nye
Deputy Clerk
Williams County Sheriff's Office
1425 E High St., Suite 103
Bryan, OH 43506
419-633-5021"

This signature block identifies Ms. Nye as an employee of the Williams County Sheriff's Office, not Bryan Municipal Court.

2. EMPLOYMENT CONFIRMATION:

In her October 30, 2025 email, Ms. Nye states:

"I have been consistently employed as a Deputy Clerk for the Williams County Sheriff's Office since 2013. There has been no transfer of position or break in service."

This confirms continuous employment with the Sheriff's Office (law enforcement) from 2013 through the present, including February 26, 2024 when she signed the criminal complaint in this case.

3. COUNTY LEGAL APPROVAL:

In her October 30, 2025 email, Ms. Nye states:

"I forwarded this email to our county legal counsel and they advise my prior email providing my Appointment of Deputy Clerk satisfies this request in it's entirety."

This confirms that:
- Williams County legal counsel was consulted about this arrangement
- County officials approved her dual role
- This is official policy/practice, not an isolated error
- County knowledge and approval establishes Monell liability

III. SIGNIFICANCE OF THIS EVIDENCE

This email correspondence conclusively proves the allegations in the Motion to Vacate:

A. CONFLICT OF INTEREST

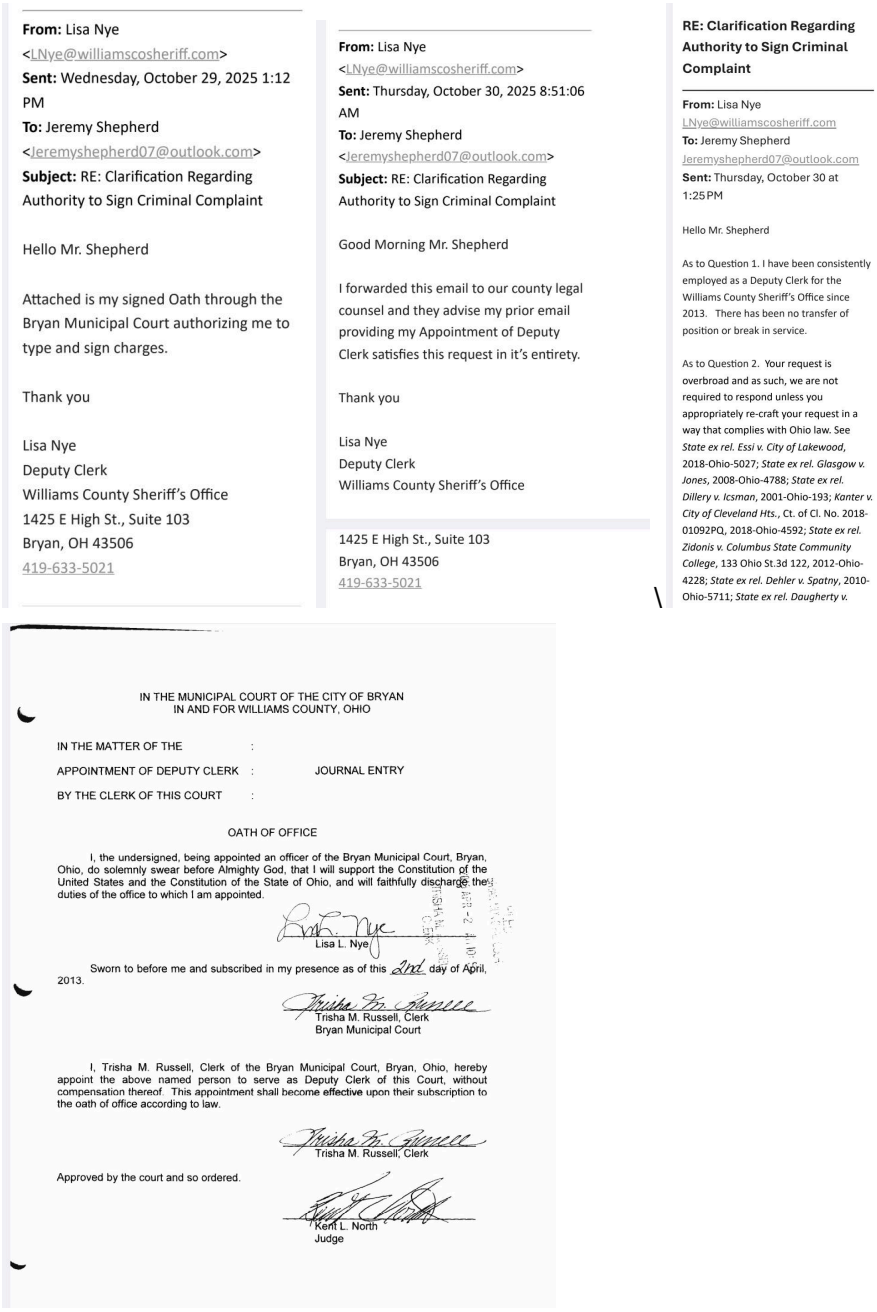
Lisa L. Nye was employed by the Williams County Sheriff's Office (law enforcement/executive branch) at the time she signed a criminal complaint purporting to act as "Deputy Clerk" of Bryan Municipal Court (judicial branch).

This creates an inherent and disqualifying conflict of interest. Law enforcement personnel cannot exercise judicial functions. The separation of powers doctrine prohibits one person from simultaneously serving law enforcement and judicial roles.

B. VOID COMPLAINT

Under Ohio law, a criminal complaint must be signed by someone with proper authority under oath. R.C. 2935.09(D); Crim.R. 3.

Ms. Nye's 2013 oath was as "Deputy Clerk" of Bryan Municipal Court signed by Kent L. North. Her continuous employment with the Sheriff's Office from 2013 onward means she was not serving as a court official when she took that oath or when she signed this complaint.



From: Lisa Nye <LNye@williamscosheriff.com>
Sent: Wednesday, October 29, 2025 1:12 PM
To: Jeremy Shepherd <Jeremyshepherd07@outlook.com>
Subject: RE: Clarification Regarding Authority to Sign Criminal Complaint

Hello Mr. Shepherd

Attached is my signed Oath through the Bryan Municipal Court authorizing me to type and sign charges.

Thank you

Lisa Nye
Deputy Clerk
Williams County Sheriff's Office
1425 E High St., Suite 103
Bryan, OH 43506
419-633-5021

From: Lisa Nye <LNye@williamscosheriff.com>
Sent: Thursday, October 30, 2025 8:51:06 AM
To: Jeremy Shepherd <Jeremyshepherd07@outlook.com>
Subject: RE: Clarification Regarding Authority to Sign Criminal Complaint

Good Morning Mr. Shepherd

I forwarded this email to our county legal counsel and they advise my prior email providing my Appointment of Deputy Clerk satisfies this request in it's entirety.

Thank you

Lisa Nye
Deputy Clerk
Williams County Sheriff's Office

1425 E High St., Suite 103
Bryan, OH 43506
419-633-5021

RE: Clarification Regarding Authority to Sign Criminal Complaint

From: Lisa Nye
LNye@williamscosheriff.com
To: Jeremy Shepherd
Jeremyshepherd07@outlook.com
Sent: Thursday, October 30 at 1:25 PM

Hello Mr. Shepherd

As to Question 1. I have been consistently employed as a Deputy Clerk for the Williams County Sheriff's Office since 2013. There has been no transfer of position or break in service.

As to Question 2. Your request is overbroad and as such, we are not required to respond unless you appropriately re-craft your request in a way that complies with Ohio law. See *State ex rel. Essi v. City of Lakewood*, 2018-Ohio-5027; *State ex rel. Glasgow v. Jones*, 2008-Ohio-4788; *State ex rel. Dillery v. Icsman*, 2001-Ohio-193; *Kanter v. City of Cleveland Hts.*, Ct. of Cl. No. 2018-01092PQ, 2018-Ohio-4592; *State ex rel. Zidonis v. Columbus State Community College*, 133 Ohio St.3d 122, 2012-Ohio-4228; *State ex rel. Dehler v. Spatny*, 2010-Ohio-5711; *State ex rel. Daugherty v.*

IN THE MUNICIPAL COURT OF THE CITY OF BRYAN
IN AND FOR WILLIAMS COUNTY, OHIO

IN THE MATTER OF THE :
APPOINTMENT OF DEPUTY CLERK : JOURNAL ENTRY
BY THE CLERK OF THIS COURT :

OATH OF OFFICE

I, the undersigned, being appointed an officer of the Bryan Municipal Court, Bryan, Ohio, do solemnly swear before Almighty God, that I will support the Constitution of the United States and the Constitution of the State of Ohio, and will faithfully discharge the duties of the office to which I am appointed.

Lisa L. Nye

Sworn to before me and subscribed in my presence as of this 2nd day of April, 2013.

Trisha M. Russell, Clerk
Bryan Municipal Court

I, Trisha M. Russell, Clerk of the Bryan Municipal Court, Bryan, Ohio, hereby appoint the above named person to serve as Deputy Clerk of this Court, without compensation thereof. This appointment shall become effective upon their subscription to the oath of office according to law.

Trisha M. Russell, Clerk

Approved by the court and so ordered.

Kent L. North
Judge

EXHIBIT A and D

A law enforcement employee claiming court authority creates a void complaint. The complaint is the foundation of the prosecution. If the complaint is void, all subsequent proceedings are void.

C. MUNICIPAL LIABILITY

Ms. Nye's statement that she "forwarded this email to our county legal counsel" and received approval establishes that Williams County officials knew about and approved this arrangement.

This creates municipal liability under Monell v. Department of Social Services, 436 U.S. 658 (1978). When a municipality has a policy or custom that causes constitutional violations, the municipality can be held liable.

Here, Williams County has a policy/custom of allowing Sheriff's Office employees to exercise judicial authority to sign criminal complaints. This policy directly caused the constitutional violations in this case.

D. PATTERN AND PRACTICE

Ms. Nye's email states she has been employed "consistently" since 2013. This suggests she has signed numerous criminal complaints over 12 years while employed by the Sheriff's Office.

Defendant requests the Court order production of all criminal complaints signed by Lisa L. Nye from 2013 to present to determine the scope of this practice.

IV. INDEPENDENT GROUNDS FOR VACATUR

This evidence provides independent grounds to vacate the conviction, separate from all other grounds alleged in the Motion to Vacate:

The complaint is void due to conflict of interest. A void complaint cannot support a conviction. The conviction must be vacated.

V. AUTHENTICATION

The email correspondence is authentic and admissible:
- It was sent from official Williams County Sheriff's Office email address (LNye@williamscosheriff.com)
- It bears official signature block
- It was sent in response to Defendant's official inquiry
- It contains statements against interest (admissions)
- It is self-authenticating as a business record

VII. JUDGE NORTH'S SIGNATURE ON THE 2013 OATH

The 2013 oath appointing Lisa L. Nye as "Deputy Clerk" bears the signature of Judge Kent L. North, who is currently presiding over this case (Exhibit D).

This demonstrates:

1. Judge North personally approved this arrangement in 2013

2. Judge North knew about Ms. Nye's role

3. Judge North has a conflict of interest in now ruling on challenges to the arrangement he approved

4. The systemic nature of the problem - not an isolated error by one person, but institutional approval from the judge presiding over this case

5. Judge North's impartiality is reasonably questioned when ruling on motions challenging his own prior official act

This provides additional grounds for vacating the conviction: the judge presiding over the case has a direct conflict of interest stemming from his approval of the conflicted arrangement that produced the void
complaint.

VI. RELIEF REQUESTED

This supplemental evidence proves the Motion to Vacate must be granted. Defendant requests:

1. The Court accept this supplemental evidence in support of Motion to Vacate;

2. The Court VACATE the conviction due to void complaint;

3. The Court DISMISS all charges with prejudice;

4. The Court ORDER production of all criminal complaints signed by Lisa L. Nye from 2013-present;

5. The Court REFER this matter to appropriate authorities for investigation of systematic misuse of judicial authority by law enforcement personnel.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com
Date: December 5, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via email upon:

James F. Duranczyk, City Prosecutor

c/o pnickolite@cityofbryan.com

Date: December 5, 2025

/s/ Jeremy Lee Shepherd

FILED
BRYAN MUNICIPAL COURT
Dec 9, 2025 - 03:03:58 PM

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO
v.
JEREMY LEE SHEPHERD — Case No. CRB2400102

DEFENDANT'S FINAL EMERGENCY OBJECTION AND NOTICE OF FEDERAL INTERVENTION — DEMAND TO STAY HEARING

Now comes Defendant, Jeremy Lee Shepherd, pro se, and objects to any hearing scheduled for December 9, 2025 at 1:00 PM. Because:

1. The Court has not ruled on the pending Motion to Vacate or ADA accommodation requests. Proceeding would violate federal law.

2. The original criminal complaint is constitutionally void due to the signer's conflict of interest, which undermines jurisdiction from inception.

3. The Probation Violation Report is sealed — Defendant has no notice of the allegations or evidence, depriving him of due process.

4. Attempting to proceed with an oral hearing while requiring written accommodation constitutes discrimination under the ADA (42 U.S.C. § 12132) and 28 C.F.R. § 35.130(b).

5. Plaintiff has filed or will imminently file a federal civil-rights complaint and motion for injunctive relief, putting this Court on notice of federal court oversight.

Accordingly, Defendant demands that:
a. The December 9, 2025 hearing be stayed immediately;
b. No arrest warrant or enforcement actions be issued;
c. All enforcement, probation, or judicial actions be suspended pending federal review.

Issued under penalty of perjury.

/s/ Jeremy Lee Shepherd
Date: December 9, 2025

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served via email on the Bryan City Prosecutor's Office on this 9thth day of December, 2025.

/s/ Jeremy Lee Shepherd

Jeremy Lee Shepherd

JOURNALIZED 12/12/25

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO
Plaintiff

CASE NO: CRB 2400102

V.

JUDGMENT ENTRY

JEREMY SHEPHERD

Defendant

This matter came on for hearing on the ten (10) motions filed with the court since November 14, 2025. The Defendant failed to appear at the hearing set by the court December 9. 2025. A domestic violence charge was filed with the court on March 4, 2024. The Defendant entered a guilty plea to an amended charge of assault on August 27, 2024. The Defendant was given a fine and court costs, a suspended jail sentence and placed on probation/community control for a period of three (3) years. The Defendant filed his first motion on November 14, 2025 for an accommodation under the Americans with Disability Act. The only documentation submitted was a copy of his current SSDI award. No further testimony or documentation was provided. Wherefore, this request is denied due to no further evidence being presented. On November 17, 2025, the Defendant filed a motion to seal the ADA filings from November 15, 2025 and on November 18, 2025, the Defendant filed a motion to immediately seal the November 15, 2025 filings. The motions are denied.

On November 21, 2025, the Defendant filed a motion to vacate the judgment and dismissal. The Court finds the motion was not timely filed under the rules of criminal

procedure. The time for the Defendant to file an appeal of his conviction has passed. An appeal shall have been filed on or before 30 days after the conviction was journalized. The conviction was journalized on August 27, 2024. The next motion was filed on November 25, 2025 for written orders and expedited rulings. The Court denies the motion. Next, the Defendant filed a motion for reasonable accommodation under the ADA on November 26, 2025. The Defendant failed to appear to present evidence as to what may be reasonable under his disability. The motion is denied at this time.

Next, on December 2, 2025, the Defendant filed a motion to dismiss the probation violation filed with the court for failing to provide a current address and failing to meet and report to his probation officer. The motion is denied. On December 5, 2025, the Defendant filed a motion to vacate and seal the case file. The motion is denied as the Defendant has not completed serving his sentence as set forth in the August 27, 2024 judgment order and is currently not eligible for his conviction to be sealed under current law in the State of Ohio as his sentence has not been completed. The next filing, filed on December 5, 2025, a motion to compel discovery and production of documents is denied. The case is not pending and all discovery was provided prior to defense counsel and the defendant when the case was active in 2024. Finally, the Defendant filed an emergency motion to stay the December 9, 2025 hearing date. The motion is denied.

Judge

FILED
Municipal Court
2025 DEC 12 AM 10:50
TRISHA M. RUSSELL
CLERK

BRYAN MUNICIPAL COURT

1399 E. High Street, P. O. Box 546
Bryan, OH 43506
(419) 636-6939 Fax (419) 636-3417
www.bryanmunicipalcourt.com

	Case Number	Section	Description
State of Ohio, (SHF)	CRB2400102	2903.13A	ASSAULT

vs.

Shepherd, Jeremy

NOTICE OF ASSIGNMENT

You are hereby notified that the above case has been assigned for:

PROBATION VIOLATION HEARING AND HEARING REGARDING ALL MOTIONS FILED BY DEFENDANT

12/09/2025 at 01:00 PM.

Previous assignment taken out by the .

Dec 1, 2025

Trisha M Russell
Clerk of Court

Kimberly G. Houk
Chief Deputy Clerk

cc:
✓Prosecutor

Shepherd, Jeremy - Emailed ✓

FILED
BRYAN MUNICIPAL COURT
2025 DEC 17 AM 9:07
TRISHA M. RUSSELL
CLERK

Judgment Entry

Date 12-17-2025 Defendant failed to appear for P.V. Hearing. Issue warrant.

Time Charged To: _____ Defendant _____ State

_____ cc: Defendant

Kent L. North, Judge

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

State of Ohio,	)	Case No. CRB2400102
	)	
Plaintiff,	)	
	)	
v.	)	NOTICE OF APPEAL TO THE
	)	SIXTH DISTRICT COURT OF APPEALS
Jeremy L. Shepherd,	)	
Defendant.	)	

Notice of Appeal

Please take notice that Defendant, Jeremy L. Shepherd, pro se, hereby appeals to the Sixth District Court of Appeals from the final Judgment Entry and Order journalized by the Bryan Municipal Court on December 12, 2025, in Case No. CRB2400102.

Dated: January 7, 2026

Respectfully submitted:

/s/ Jeremy Lee Shepherd
Jeremy L. Shepherd, Pro Se
Email for service: jeremyshepherd07@outlook.com

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via email upon:

James F. Duranczyk, City Prosecutor
c/o pnickolite@cityofbryan.com

Date: January 7th, 2026

/s/ Jeremy Lee Shepherd

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

State of Ohio,)
Plaintiff,)
) Case No. CRB2400102
v.)
)
Jeremy L. Shepherd,)
Defendant.)

MOTION TO WAIVE, SUSPEND, OR STAY FINES AND COSTS PENDING APPEAL;
MOTION TO WAIVE APPEAL-RELATED FEES;
AND AFFIDAVIT OF INDIGENCY

Now comes Defendant, Jeremy L. Shepherd, pro se, and moves this Court for an Order (1) waiving, suspending, or staying the collection of fines, costs, and appeal-related fees (including any “appeal filing fee” assessed on the docket) pending resolution of Defendant’s appeal and related enforcement issues; and (2) granting indigency status for purposes of fees and costs in this case. Defendant states as follows:

1. Defendant is indigent and unable to pay the costs and fees assessed in this case without undue hardship. Defendant incorporates the attached Affidavit/Declaration of Indigency.

2. The docket reflects additional appeal-related costs/fees being assessed and/or collected while
Defendant is pursuing appellate relief and emergency stay relief concerning enforcement. Continuing to assess or collect fees under these circumstances will impose undue hardship and risks compounding enforcement consequences.

3. Defendant requests that the Court (a) waive any appeal-related filing fee assessed in this case,
and (b) suspend/stay any collection activity or additional cost accruals pending resolution of the appeal and the associated enforcement matters.

WHEREFORE, Defendant respectfully requests that the Court:
A. Find Defendant indigent for purposes of fees and costs in this matter;
B. Waive any appeal-related filing fee assessed by the trial court (including any $35 “appeal filing
fee” reflected on the docket, if applicable);
C. Suspend or stay the assessment/collection of costs and fees pending the outcome of the appeal
and related enforcement proceedings; and
D. Grant such other relief as is just.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com
Date: January 12, 2026

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion was served by electronic mail upon the prosecutor of record on January 12, 2026.

/s/ Jeremy Lee Shepherd

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

State of Ohio,)
Plaintiff,)
) Case No. CRB2400102
v.)
)
Jeremy L. Shepherd,)
Defendant.)

EMERGENCY MOTION TO RECALL/QUASH BENCH WARRANT AND
FOR ADA-COMPLIANT WRITTEN PROCEDURE / RESET HEARING

Now comes Defendant, Jeremy L. Shepherd, pro se, and moves this Court to recall/quash the bench warrant issued after the alleged failure to appear on December 9, 2025.

1. FTA WAS NOT WILLFUL; DUE PROCESS / NOTICE ISSUES
Defendant's nonappearance was not willful. Prior to the December 9, 2025 setting, Defendant submitted written objections and requested reasonable ADA accommodations due to disability-related
limitations, including written-only participation rather than a real-time oral hearing. Defendant also objected to proceeding without meaningful access to the probation-violation allegations, including sealed allegations, which prevented meaningful notice and a fair opportunity to prepare
and be heard.

2. ADA REQUEST (EXPEDITED; NOT A DELAY)
Defendant does not seek delay and will respond as quickly as practicable. Defendant requests written-only participation as a reasonable accommodation, with response windows of up to three (3)
business days for routine matters and up to seven (7) business days for substantive matters. Nothing
in this request limits Defendant from responding sooner when able.

3. RELIEF REQUESTED
WHEREFORE, Defendant requests that the Court:
A. Recall/quash the bench warrant associated with the alleged December 9, 2025 FTA;
B. Suspend enforcement and collateral consequences pending a reset proceeding;
C. Reset any hearing only after Defendant receives meaningful notice of the allegations and an ADA-compliant process (written participation and written deadlines); and
D. Grant such other relief as is just.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com
Date: January 12th, 2026

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion was served by electronic mail upon the prosecutor of record on January 12th, 2026.

/s/ Jeremy Lee Shepherd

IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

State of Ohio,)
Plaintiff,)
) Case No. CRB2400102
v.)
)
Jeremy L. Shepherd,)
Defendant.)

MOTION FOR PROTECTIVE ORDER AND FOR LEAVE TO USE EMAIL FOR SERVICE AND NOTICE;
MOTION TO FILE SERVICE ADDRESS UNDER SEAL

Now comes Defendant, Jeremy L. Shepherd, pro se, and respectfully moves this Court for a protective order governing Defendant's contact information and for leave to use Defendant's email address for service and notice in this case, and further for leave to provide any physical service address under seal if the Court requires one.

1. SAFETY CONCERNS / NEED FOR PROTECTION
Defendant has safety concerns arising from this matter that make public disclosure of Defendant's current location and residential address unsafe. Defendant therefore cannot place a current physical address on the public docket without risk.

2. REQUEST FOR EMAIL SERVICE AND NOTICE
Defendant requests permission to designate email as Defendant's service address for purposes of all notices and service:
jeremyshepherd07@outlook.com

3. ALTERNATIVE: ADDRESS UNDER SEAL IF REQUIRED
If this Court determines a physical address must be provided, Defendant requests leave to provide a "safe service address" under seal (or by confidential submission to the Clerk), not accessible to the public or opposing parties absent further order of the Court.

4. NO PREJUDICE
This request is made to ensure meaningful access to the courts and the orderly processing of the case without compromising Defendant's safety. Allowing email service and/or sealed address

designation will not prejudice the State.

WHEREFORE, Defendant respectfully requests that this Court:
A. Permit Defendant to use email for service and notice at jeremyshepherd07@outlook.com;
B. Issue a protective order prohibiting public docketing of Defendant's current residential address
and location; and
C. Permit any physical service address, if required, to be filed under seal or provided confidentially to the Clerk; and
D. Grant such further relief as is just.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email (service): jeremyshepherd07@outlook.com
Date: January 12th, 2026

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion was served by electronic mail upon the prosecutor of record on January 12th, 2026.

/s/ Jeremy Lee Shepherd